

October 26, 2018

Dan Riedl, Esquire
Office of the United States Attorney
Northern District of Ohio

Re: Discovery
United States of America v. Phillip Durachinsky
Case No.: 1:18CR22

Dear Dan:

In follow up to earlier conversations and my initial written request for discovery, I am requesting the following items, which I believe that I am entitled to, pursuant to the Government's discovery obligations:

1. A comprehensive list of all of the individuals and/or organizations whose computers were affected by any conduct on the part of the Defendant. This would be a list all of the victims in this case. I am requesting the complete name and address of each individual or organization.
2. Any and all information pertaining to the issue of "loss". This would include all information relating to damages sustained by each victim, as well as any evidentiary support for those claimed damages. I believe that I am entitled to this information prior to trial.
3. All search warrants, search warrant affidavits, search warrant returns, and applications for PRTT, that pertain to this case.
4. Any video or audio recording made by law enforcement at the time of their search of Defendant's home on January 18, 2017.
5. Complete responses to my Motion for a Bill of Particulars.

I certainly have appreciated your prior efforts during the discovery process, however, I believe that the aforementioned requested information is vital to preparing this

case for trial, and protecting my client's various constitutional and due process rights. Finally, As soon as my expert is approved by the Sixth Circuit, we can make arrangements for him to inspect the computers and the computer evidence. Please feel free to call me if you have any questions.

Sincerely yours,
/s/Thomas E. Conway
Thomas E. Conway